

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

: NO. 3:CR-12- 179

-vs-

EDWARD MCLAUGHLIN,

Defendant

INDICTMENT

THE GRAND JURY CHARGES:

Count 1

From in or about February 2011, to in or about June 2012, in the Middle District of Pennsylvania, and elsewhere, the defendant,

EDWARD MCLAUGHLIN,

did combine, confederate, and agree with another person, whose identity is known to the grand jury, to commit the following offense against the United States, to wit: the use and causing another to use the mail and a facility of interstate commerce, that is a telephone, with intent that the murder of Joanna Van Tine be committed in violation of the laws of the Commonwealth of Pennsylvania as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: money and a job paying a salary of approximately \$50,000, in violation of Title 18, United States Code, Section 1958.

Manner and Means of the Conspiracy

The manner and means by which the defendant and his co-conspirator sought to accomplish the objectives of the conspiracy included, among others, the following:

1. The defendant solicited another person to murder his ex-wife.

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2. The defendant mailed and shipped, or caused to be mailed and shipped, a firearm and ammunition to a co-conspirator in the Middle District of Pennsylvania, for the co-conspirator to use to murder the defendant's ex-wife.

3. The defendant wrote and mailed, or caused to be mailed, letters and made telephone calls to a co-conspirator in the Middle District of Pennsylvania in which the defendant provided instructions to the co-conspirator regarding the intended murder of the defendant's ex-wife.

4. The defendant promised to provide money and employment with a salary of approximately \$50,000 per year to a co-conspirator as consideration for the co-conspirator's murder of the defendant's ex-wife.

Overt Acts

The defendant and/or his co-conspirator committed the following overt acts, among others, in furtherance of the conspiracy:

1. Between February 2011 and May 2012, the defendant solicited another person to kill his ex-wife.

2. On or about March 5, 2012, the defendant shipped or caused to be shipped a Mauser rifle from Florida to a co-conspirator in Scranton, Pennsylvania.

3. In or about January 2012 to in or about May 2012, the defendant wrote and mailed or caused to be mailed letters to a co-conspirator urging the co-conspirator to murder the defendant's ex-wife and instructing the co-conspirator regarding how to commit the murder.

4. In or about January 2012 to in or about June 2012, the defendant contacted a co-conspirator via telephone to solicit the co-conspirator to murder the defendant's ex-wife.

All in violation of Title 18, United States Code, Section 1958.

THE GRAND JURY FURTHER CHARGES:

Count 2

From in or about February 2011, to in or about May 2012, in the Middle District of Pennsylvania, the defendant,

EDWARD MCLAUGHLIN,

with the intent that another person or persons engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade another person to engage in such conduct, that is, a violation of Title 18, United States Code, Section 1958(use of the mail and interstate commerce facilities with the intent that a murder be committed in violation of the laws of any state).

In violation of Title 18, United States Code, Section 373.

THE GRAND JURY FURTHER CHARGES:

Count 3

In or about March 2012 to in or about June 2012, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the Defendant,

EDWARD MCLAUGHLIN,

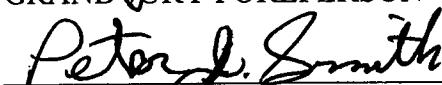
aiding and abetting another person, and aided and abetted by another person, did knowingly use, possess and carry a firearm, namely a Mauser bolt action rifle, Model 48, 8mm caliber, serial number M57032, during and in relation to, and in furtherance of, crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to use the mail and a facility of interstate commerce to commit a murder for hire, a violation of 18 U.S.C. Section 1958.

All in violation of Title 18, United States Code, Section 924(c) and 2.

A TRUE BILL:

7/17/2012
DATE


GRAND JURY FOREPERSON


PETER J. SMITH
United States Attorney